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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re the matter of

MELDON R. DOBSON and
NATASHA A. DOBSON
a/k/a NATASHA A. BROWN,

Debtors.

NO. 19-03328
CHAPTER 13

JUDGE TIMOTHY A. BARNES

NOTICE OF MOTION

TO:

Meldon R. Dobson
Natasha A. Dobson
9824 Crawford
Skokie, IL 60076
BY U.S. MAIL

David M. Siegel, Attorney for Debtors
Marilyn O. Marshall, Chapter 13 Trustee

BY ELECTRONIC TRANSMISSION
BY ELECTRONIC TRANSMISSION

PLEASE TAKE NOTICE that on November 21, 2019, at 9:30 a.m., or as soon thereafter as Counsel may be heard, we shall appear before the Honorable TIMOTHY A. BARNES, Bankruptcy Judge, at **219 South Dearborn Street, Courtroom #744, Chicago, Illinois**, and then and there present the attached Motion to Modify the Automatic Stay, a copy of which is hereby served upon you.

PROOF OF SERVICE

I, the undersigned attorney, certify that I served a copy of this Notice with Motion to Modify the Automatic Stay attached, upon the parties listed above, by the methods specified, from 2056 Ridge Road, Homewood, Illinois 60430 before the hour of 5:00 P.M. on the 11th day of November, 2019.

BY: /s/ Terri M. Long
TERRI M. LONG

LAW OFFICES OF TERRI M. LONG
2056 Ridge Road
Homewood, Illinois 60430
Phone: (708) 922-3301
Fax : (708) 922-3302
Atty. for VW CREDIT INC. D/B/A AUDI FINANCIAL SERVICES, its Successors and/or
Assigns

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MOTION TO MODIFY AUTOMATIC STAY

Now comes VW CREDIT INC. D/B/A AUDI FINANCIAL SERVICES, its successors and/or assigns, (hereinafter referred to as “Movant”) a creditor herein, by TERRI M. LONG, its attorney, and moves this Honorable Court for entry of an Order modifying the restraining provisions of §362 of the Bankruptcy Code, and in support thereof respectfully represents as follows:

1. On February 8, 2019, the Debtors herein filed a petition for relief under Chapter 13 of the Bankruptcy Code.

2. Movant is a creditor of the Debtors with respect to a certain indebtedness secured by a lien upon a 2017 Audi Q7 motor vehicle, with an outstanding balance of 38,477.74.

3. The Debtors have not offered, and Movant is not receiving, adequate protection for its secured interest or depreciating value.

4. Movant will suffer irreparable injury, harm and damage should it be delayed in taking possession of the motor vehicle aforesaid and foreclosing its security interest therein.

5. According to the Debtors’ confirmed plan, the Debtors are the disbursing agents for all payments to creditor.

6. The Debtors have caused a post-confirmation default in contract payments in the amount of \$3,896.97 as of November 6, 2019, including attorney fees and court costs.

7. Movant requests that Bankruptcy Rule 4001(a)(3) not apply to any Order granting this motion.

WHEREFORE, VW CREDIT INC. D/B/A AUDI FINANCIAL SERVICES, its successors and/or assigns, prays that this Honorable Court enter an Order modifying the restraining provisions of §362 of the Bankruptcy Code to permit the said VW CREDIT INC. D/B/A AUDI FINANCIAL SERVICES, its successors and/or assigns, to take possession of and foreclose its security interest in a certain 2017 Audi Q7 motor vehicle, V.I.N. WA1LAAF79HD000842, and for such other and further relief as this Court may deem just.

VW CREDIT INC. D/B/A AUDI
FINANCIAL SERVICES, its Successors
and/or Assigns

BY: /s/ Terri M. Long
TERRI M. LONG

LAW OFFICES OF TERRI M. LONG

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Homewood, Illinois 60430

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and/or Assigns